

AUG 8 0 2007

MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURT

UNITED STATES OF AMERICA

v.

CAMMIE JONES-EWUASHO,
BRIDGET WILLIAMS,
CONSTANCE HALL, and
SIRETTA HALL

No. 07 CR **07CR** **562**

) Violations: Title 18, United States Code,
) Sections 1028(a)(7), 1028(f), and 2

JUDGE CASTILLO

COUNT ONE

MAGISTRATE JUDGE COLE

1. At times material to this indictment:

- a. Company A was a law firm in Chicago, Illinois.
- b. Company B was a car dealership in Chicago, Illinois.

2. Beginning in approximately 2001 and continuing until at least August 2004, in the Northern District of Illinois, Eastern Division and elsewhere,

CAMMIE JONES-EWUASHO,
BRIDGET WILLIAMS,
CONSTANCE HALL, and
SIRETTA HALL.

defendants herein, did conspire with each other, and with others known and unknown to the Grand Jury, to knowingly transfer, possess and use, in and affecting interstate commerce, without lawful authority, means of identification of other persons, including but not limited to names, dates of birth, social security numbers, credit card numbers, and bank account numbers, with the intent to commit, and to aid and abet, unlawful activity that constitutes a violation of federal law, namely, mail fraud (Title 18, United States Code, Section 1341), and constitutes a felony under state law, namely, felony

identity theft (720 ILCS 5/16G-15), all in violation of Title 18, United States Code, Section 1028(a)(7).

3. It was part of the conspiracy that between approximately 2001 and approximately August 2004, defendants JONES-EWUASHO, WILLIAMS, C. HALL, and S. HALL obtained personal identifying information, including names, birth dates, social security numbers, credit card numbers, and bank account information (the "victim identifying information") belonging to individuals who were employed at and/or clients of Companies A and B, and other businesses in the Chicago area. Defendants obtained the victim identifying information without the permission of the victims to whom the information belonged.

4. It was further part of the conspiracy that defendants fraudulently used the victim identifying information to obtain the victims' credit reports. Defendants then used the credit reports to obtain additional victim identifying information.

5. It was further part of the conspiracy that defendants fraudulently used the victim identifying information to obtain goods and services through the mail, by telephone, over the internet, and through point-of-sale transactions.

6. It was further part of the conspiracy that defendants fraudulently used the victim identifying information to open bank accounts and obtain credit cards in their own or the victims' names. In some instances, defendants fraudulently used forged and counterfeit checks to inflate the balance of the accounts they had obtained.

7. It was further part of the conspiracy that after ordering goods through the mail, over the phone, or over the internet, defendants regularly had the merchandise shipped to their residences

or various other locations around Chicago. Upon delivery, defendants signed for the merchandise either in their own names or others' names.

8. It was further part of the conspiracy that defendants fraudulently obtained a total of more than \$140,000 in goods, services, and cash.

9. It was further part of the conspiracy that the defendants otherwise misrepresented, concealed, and hid, and caused to be misrepresented, concealed, and hidden, the purposes of and the acts done in furtherance of the conspiracy, and used means to avoid detection by law enforcement authorities;

All in violation of Title 18, United States Code, Sections 1028(f) and 2.

COUNT TWO

The SPECIAL JUNE 2007 GRAND JURY further charges:

Between on or about September 11, 2002 and on or about May 2, 2003, at Chicago, in the Northern District of Illinois, Eastern Division,

CONSTANCE HALL and
SIRETTA HALL,

defendants herein, did knowingly transfer, possess and use in and affecting interstate commerce, without lawful authority, a means of identification of another person, namely, the name and social security number of Victim F, with the intent to commit and to aid and abet unlawful activity that constitutes a violation of federal law, namely, mail fraud (Title 18, United States Code, Section 1341), and constitutes a felony under state law, namely, felony identity theft (720 ILCS 5/16G-15));

All in violation of Title 18, United States Code, Sections 1028(a)(7) and 2.

COUNT THREE

The SPECIAL JUNE 2007 GRAND JURY further charges:

Between on or about October 3, 2002 and on or about November 6, 2002, at Chicago, in the Northern District of Illinois, Eastern Division,

CAMMIE JONES-EWUASHO,
BRIDGET WILLIAMS and
SIRETTA HALL,

defendants herein, did knowingly transfer, possess and use in and affecting interstate commerce, without lawful authority, a means of identification of another person, namely, the name and social security number of Victim C, with the intent to commit and to aid and abet unlawful activity that constitutes a violation of federal law, namely, mail fraud (Title 18, United States Code, Section 1341), and constitutes a felony under state law, namely, felony identity theft (720 ILCS 5/16G-15);

All in violation of Title 18, United States Code, Sections 1028(a)(7) and 2.

COUNT FOUR

The SPECIAL JUNE 2007 GRAND JURY further charges:

On or about January 21, 2003, at Chicago, in the Northern District of Illinois, Eastern Division,

CAMMIE JONES-EWUASHO,

defendant herein, did knowingly transfer, possess and use in and affecting interstate commerce, without lawful authority, a means of identification of another person, namely, the name and access device of Victim A, with the intent to commit and to aid and abet unlawful activity that constitutes a violation of federal law, namely, mail fraud (Title 18, United States Code, Section 1341), and constitutes a felony under state law, namely, felony identity theft (720 ILCS 5/16G-15);

All in violation of Title 18, United States Code, Sections 1028(a)(7) and 2.

COUNT FIVE

The SPECIAL JUNE 2007 GRAND JURY further charges:

On or about March 20, 2003, at Chicago, in the Northern District of Illinois, Eastern Division,

CAMMIE JONES-EWUASHO,

defendant herein, did knowingly transfer, possess and use in and affecting interstate commerce, without lawful authority, means of identification of other persons, namely, the name and access device of Victim B, with the intent to commit and to aid and abet unlawful activity that constitutes a violation of federal law, namely, mail fraud (Title 18, United States Code, Section 1341), and constitutes a felony under state law, namely, felony identity theft (720 ILCS 5/16G-15);

All in violation of Title 18, United States Code, Sections 1028(a)(7) and 2.

COUNT SIX

The SPECIAL JUNE 2007 GRAND JURY further charges:

On or about July 17, 2003, at Chicago, in the Northern District of Illinois, Eastern Division,

CONSTANCE HALL,

defendant herein, did knowingly transfer, possess and use in and affecting interstate commerce, without lawful authority, a means of identification of another person, namely, the name and access device of Victim E, with the intent to commit and to aid and abet unlawful activity that constitutes a violation of federal law, namely, mail fraud (Title 18, United States Code, Section 1341), and constitutes a felony under state law, namely, felony identity theft (720 ILCS 5/16G-15);

All in violation of Title 18, United States Code, Sections 1028(a)(7) and 2.

FORFEITURE ALLEGATION

The SPECIAL JUNE 2007 GRAND JURY further charges:

1. The allegations contained in Counts One through Six of this indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 982.

2. As a result of the violations of Title 18, United States Code, Section 1028, as alleged in the foregoing Counts One through Six,

CAMMIE JONES-EWUASHO,
BRIDGET WILLIAMS,
CONSTANCE HALL, and
SIRETTA HALL,

defendants herein, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982: (1) any and all right, title, and interest defendants may have in any property, real and personal, which constitutes and is derived from, proceeds obtained directly or indirectly from fraud and related activity in connection with means of identification and identification documents, which property is subject to forfeiture pursuant to Title 18, United States Code, Section 982; and (2) any and all right, title, and interest defendants may have in any property, real or personal, used or intended to be used to commit the offenses alleged in Counts One through Six of this indictment, which property is subject to forfeiture pursuant to Title 18, United States Code, Section 1028(b)(5).

3. The interests of defendants subject to forfeiture to the United States pursuant to Title 18, United States Code, Section 982, include, but are not limited to:

- (a) all property that was used to further the fraud and related activity in connection with false identification documents;

- (b) all money and other property that constituted or derived from the proceeds of each transaction, and was obtained directly or indirectly, as a result of that violation, including, but not limited to approximately \$140,426.66.

4. If any of the forfeitable property described above, as a result of any act or omission by the defendants:

- (a) Cannot be located upon the exercise of due diligence;
- (b) Has been transferred or sold to, or deposited with, a third party;
- (c) Has been placed beyond the jurisdiction of the Court;
- (d) Has been substantially diminished in value; or
- (e) Has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property under the provisions of Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1).

All pursuant to Title 18, United States Code, Sections 982(a)(2)(B) and 1028(b)(5).

A TRUE BILL:

FOREPERSON

UNITED STATES ATTORNEY